

EXHIBIT 3

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Attorneys for OL Private Counsel, LLC

**IN THE THIRD JUDICIAL DISTRICT COURT IN AND FOR
SALT LAKE COUNTY, STATE OF UTAH**

OL PRIVATE COUNSEL, LLC, a Utah
limited liability company,

Plaintiff,

v.

EPHRAIM OLSON, a Utah resident,

Defendant.

**OL PRIVATE COUNSEL, LLC'S
INITIAL DISCLOSURES**

Case No. 210901401

Judge James Gardner

Tier III

Pursuant to Utah Rule of Civil Procedure 26(a)(1), Plaintiff OL Private Counsel, LLC ("OL Private Counsel"), by and through its undersigned counsel, hereby submits its initial disclosures. In providing its initial disclosures, OL Private Counsel does not waive any attorney-client privilege, the attorney work-product privilege, or any other applicable privilege, doctrine, or immunity. Moreover, OL Private Counsel makes the following disclosures based upon the information now reasonably available to it. OL Private Counsel reserves the right to further supplement its initial disclosures as additional discovery, investigation, and analysis may warrant.

I. Individuals (Utah R. Civ. P. 26(a)(1)(A)).

A. Individuals Likely to Have Discoverable Information (Utah R. Civ. P. 26(a)(1)(A)(i)).

Listed below are the names of individuals (other than counsel) who are likely to have discoverable information that OL Private Counsel may use to support its claims or defenses, excepting information to be used solely for impeachment. Where known, the subject areas of which the individual may have knowledge are indicated.

1. Thomas Olson.

Thomas Olson should be contacted only through Plaintiff's counsel. Thomas Olson has information regarding Plaintiff's claims set forth in the pleadings on file with the Court.

2. Hyrum Olson.

Hyrum Olson should be contacted only through Plaintiff's counsel. Hyrum Olson has information regarding Plaintiff's claims set forth in the pleadings on file with the Court.

3. Ephraim Olson.

Ephraim Olson has information regarding Plaintiff's claims set forth in the pleadings on file with the Court.

4. Carolyn Olson.

Carolyn Olson has information regarding Plaintiff's claims set forth in the pleadings on file with the Court.

5. Timothy Akarapanich.

Timothy Akarapanich should be contacted only through Plaintiff's counsel. Timothy Akarapanich has information regarding Plaintiff's claims set forth in the pleadings on file with the Court.

B. Fact Witnesses OL Private Counsel May Call (Utah R. Civ. P. 26(a)(1)(A)(ii)).

1. Thomas Olson.

Thomas Olson may testify regarding Plaintiff's claims as set forth in the pleadings on file with the Court.

2. Hyrum Olson.

Hyrum Olson may testify regarding Plaintiff's claims as set forth in the pleadings on file with the Court.

3. Timothy Akarapanich.

Timothy Akarapanich may testify regarding Plaintiff's claims as set forth in the pleadings on file with the Court.

4. Carolyn Olson

Under Utah R. Civ. P. 26(a)(1)(A)(ii), OL Private Counsel is not required to provide a summary of expected testimony of an adverse witness.

5. Ephraim Olson.

Under Utah R. Civ. P. 26(a)(1)(A)(ii), OL Private Counsel is not required to provide a summary of expected testimony of an adverse witness.

II. Documents OL Private Counsel May Offer (Utah R. Civ. P. 26(a)(1)(B)).

A copy of all documents OL Private Counsel has thus far located that it may offer in its case-in-chief, as required by Utah R. Civ. P. 26(a)(1)(B), are being served with these initial disclosures. In addition, OL Private Counsel may use documents that are produced by any party or third party in this matter. If additional documents are identified, OL Private Counsel will supplement its productions as required by Utah R. Civ. P. 26. This disclosure should not be

interpreted as limiting OL Private Counsel's ability to provide additional information as permitted by the Utah Rules of Civil Procedure or the Court.

III. Computation of Damages (Utah R. Civ. P. 26(a)(1)(C)).

OL Private Counsel seeks money damages in an amount to be determined at trial, including all reasonable and foreseeable damages that could have been avoided if Defendant Ephraim Olson had not engaged in the wrongdoing described in the complaint. OL Private Counsel's damages consist of harm to its goodwill, loss of clients, and loss of its confidential information. OL Private Counsel also seeks punitive damages for Defendant's conversion, intentional interference with contractual relations, breach of fiduciary duty, and aiding and abetting conversion. OL Private Counsel reserves its right to assert and/or seek damages from Defendant or non-parties as the facts of the case develop and the case proceeds.

IV. Any Agreement Under Which Any Person May Be Liable to Satisfy Part or All of a Judgment or to Indemnify or Reimburse for Payments Made to Satisfy the Judgment (Utah R. Civ. P. 26(a)(1)(D)).

OL Private Counsel is not aware of any such agreements at this time. OL Private Counsel reserves the right to supplement this disclosure should agreements become known to it.

V. Documents Referred to in Pleadings (Utah R. Civ. P. 26(a)(1)(E)).

OL Private Counsel will produce documents to which it refers in its pleadings.

DATED this 14th day of April, 2021.

STOEL RIVES LLP

/s/ David Jordan

David Jordan
Mark Hindley
Jordan Hilton

Attorneys for OL Private Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of April, 2021, a true and correct copy of the foregoing **OL PRIVATE COUNSEL, LLC'S INITIAL DISCLOSURES** was served on the following via email:

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